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James J. Keller

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EX PARTE OR LATE FILED

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SEP 1 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 1, 1994

VIA HAND DELIVERY

DOCKET FILE COPY ORIGINAL

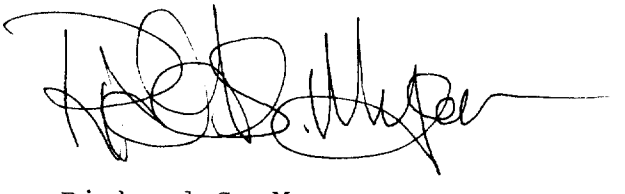
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Re: Ex Parte presentation by TeleCellular
GN Docket No. 93-252

On behalf of TeleCellular, enclosed is an original and one copy of a memorandum summarizing a presentation made to Mr. Greg Rosston of the Office of Plans and Policy pertaining to the above referenced docket. The presentation occurred on September 1, 1994.

If you have any questions regarding this matter, please contact the undersigned.

Very truly yours,



Richard S. Myers
Counsel for TeleCellular

Enclosures

No. of Copies rec'd 0+1
List ABCDE

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TeleCellular Presentation Before FCC Staff

TeleCellular is a joint venture of SMR licensees organized to provide wide area, digital, mobile telecommunications service to the island of Puerto Rico. TeleCellular's presentation to the FCC Staff offered several alternatives to the freeze imposed on 800 MHz licensing in GN Docket No. 93-252. A copy of the TeleCellular licensees' request for extended implementation was presented to the staff. A copy of that request is attached. A summary of TeleCellular's presentation is provided below.

Alternatives to the 800 MHz Freeze:

- The Commission should lift the freeze immediately. Regulatory parity does not require that all commercial radio service providers be licensed on the same basis. For example, the Commission has not announced any plan to alter its licensing framework for the cellular service, i.e., changing the service areas from MSA's and RSA's to MTA's and BTA's. 800 MHz SMR licensees have worked within the Commission's rules to establish a viable alternative to cellular and PCS that without such effort would not have even raised the issue of how to treat SMR in relation to cellular and PCS. The Commission's freeze threatens to wipe out the hard work and investment SMR entrepreneurs have expended by effectively eliminating any possibility of modifying and constructing base stations in their wide area systems.

- The Commission should lift the freeze for 800 MHz applications in Puerto Rico. Puerto Rico, while subject to the Commission's jurisdiction as a territory of the United States, presents a unique regulatory environment that should be treated separately from the rest of the United States. Puerto Rico has had trouble attracting the amount of capital required for construction of a modern communications infrastructure. Its status as an island further isolates Puerto Rico from mainland concerns. The majority of the participating licensees in TeleCellular are residents of Puerto Rico and committed to building out a communications network that will provide reliable service to their fellow residents. Lifting the freeze in Puerto Rico will not seriously strain the Commission's resources, while at the same time allowing TeleCellular and other entrepreneurs the opportunity to elevate Puerto Rico's communications infrastructure.

■ The Commission should lift the freeze with respect to applications filed by licensees that have been granted extended implementation to construct digital, wide area systems. Licensees who have received extended implementation authority are greatly burdened by the freeze because it effectively prohibits a wide area buildout, even with respect to channels not subject to the new wide area licensing plan. Such licensees may not, for example, presently file applications for microcells that will be part of the wide area system. By lifting the freeze at least for this category of applications, the Commission will ensure that it is receiving applications from those who are serious about developing wide area service.

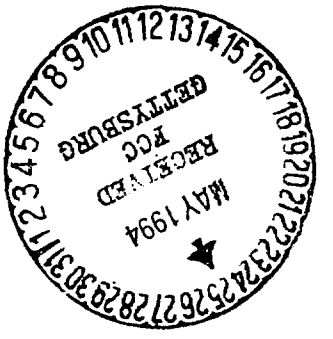
■ ***At a minimum***, the Commission should lift the freeze on all 800 MHz frequencies which will not be affected by the proposed wide area licensing plan. The Commission has indicated that the 80 SMR channels between 856-860 MHz will be subject to existing SMR licensing rules after the wide area plan is implemented. By lifting the freeze on these channels, the Commission would allow some flexibility for those who are developing wide area systems.

FILE COPY

504
Station File

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re 800 MHz Licenses of	)	
	)	
PARTICIPATING LICENSEES OF TELECELLULAR	)	Call Signs: See Exhibit 1
	)	
Request for Extended Implementation Period for Wide Area SMR System pursuant to Section 90.629 of the Commission's Rules and Request for Tolling of the Applicable Construction Deadline Pending Consideration of this Request for Extended Implementation	)	



To: Chief, Private Radio Bureau

REQUEST FOR EXTENDED IMPLEMENTATION PERIOD

PARTICIPATING LICENSEES OF TELECELLULAR

Their Attorneys

Richard S. Myers
Sean P. Beatty

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May 24, 1994

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SUMMARY

The participating Specialized Mobile Radio ("SMR") licensees in TELECELLULAR ("Participating Licensees"), by their attorneys, and pursuant to Section 90.629 of the Commission's rules, respectfully request Commission approval of an extended implementation schedule for the construction of the 800 MHz SMR licenses listed in Exhibit 1. The Participating Licensees further request that the Commission toll the one year construction period normally applicable to trunked SMR licenses pending consideration of this request for extended implementation and take expedited action on their tolling request.

The TELECELLULAR joint venture currently consists of thirteen SMR licensees and intends to offer wide area SMR service featuring advanced digital voice, data and messaging service to a projected 100,000 subscribers on the island of Puerto Rico. TELECELLULAR plans to construct 73 base stations in a five year period with over half that number to be constructed in the first two years of construction.

Due to the magnitude of this undertaking and the complex engineering required to implement this plan, the Participating Licensees seek Commission approval of a five year extended implementation period for building the system. Commission approval of this request will give TELECELLULAR the time to plan and coordinate all the necessary details related to system construction. In addition, an extended implementation period would allow TELECELLULAR to conserve resources by directly implementing a digital system as opposed to constructing analog systems to

protect the Participating Licensees' authorizations.

In addition to a request for extended implementation, the Participating Licensees also request that the Commission toll the construction period associated with their SMR licenses while it considers the instant request for extended implementation. By tolling the construction period, the Commission would only add a small period of time to the construction term, but at the same time allow the Participating Licensees sufficient time to construct their SMR stations should the Commission refuse to grant the extended implementation request. Consistent with this rationale, the Participating Licensees further request that the Commission take expedited action on the tolling request to preserve as much time as possible for the construction of systems to preserve licenses.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re 800 MHz Licenses of	)	
	)	
PARTICIPATING LICENSEES OF TELECELLULAR	)	Call Signs: See Exhibit 1
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Request for Extended Implementation Period for Wide Area SMR System pursuant to Section 90.629 of the Commission's Rules and Request for Tolling of the Applicable Construction Deadline Pending Consideration of this Request for Extended Implementation	)	

To: Chief, Private Radio Bureau

REQUEST FOR EXTENDED IMPLEMENTATION PERIOD

I. INTRODUCTION.

The participating Specialized Mobile Radio ("SMR") licensees in TELECELLULAR ("Participating Licensees"), by their attorneys, and pursuant to Section 90.629 of the Commission's rules, respectfully request Commission approval of an extended implementation schedule for the construction of the 800 MHz SMR licenses listed in Exhibit 1. The Participating Licensees further request that the Commission toll the one year construction period normally applicable to trunked SMR licenses pending consideration of this request for extended implementation and take expedited action on their tolling request.

II. BACKGROUND

TELECELLULAR is a joint venture which currently includes thirteen separate SMR licensees, ten of which hold licenses for five channel trunked SMR systems at three different locations in Puerto Rico. Eleven of the TELECELLULAR licensees have principals

who reside in Puerto Rico. Using the SMR channels provided by the Participating Licensees, TELECELLULAR intends to construct a digital, wide area SMR system that will service the island of Puerto Rico, providing voice, dispatch, data and message service to an area which sorely lacks a strong array of such services. Through its Participating Licensees, TELECELLULAR currently has use of 170 SMR channels on the island.

Due to the fact that the digital technology TELECELLULAR will use in its wide area SMR system is relatively new, as well as the magnitude of the undertaking, TELECELLULAR anticipates that the construction of its system will require more than one year. TELECELLULAR is aware of pending Commission rulemakings which could impact its project, including the Commercial Mobile Radio Service and the Expanded Mobile Service Provider rulemakings. However, given TELECELLULAR's desire to begin the project as soon as possible in view of the relative lack of the types of services TELECELLULAR intends to provide to Puerto Rico, and the time constraints inherit with a project of this size, TELECELLULAR prefers not to await the outcome of those rulemakings. TELECELLULAR, and specifically the Participating Licensees, therefore request an extended construction period for the SMR licenses referenced in Exhibit 1, pursuant to Section 90.629 of the Commission's rules.

III. REQUEST FOR EXTENDED IMPLEMENTATION.

The Commission is certainly aware that digital, wide area SMR systems constitute a major segment of the future SMR industry. As

of late December, 1992, the Commission had approved three wide area SMR systems sponsored by Fleet Call, Inc., Mobile Radio New England and Advanced Radio Communication.[1] At the time, the Commission also had fifteen additional requests pending for wide area SMR systems.[2] In the year and a half since that time, undoubtedly many more wide area SMR proposals have been filed with the Commission. Accordingly, the Commission is aware that the new generation digital SMR systems will serve the public interest by providing seamless network service to dispatch users and interconnection to the public switched network for subscribers unsatisfied or unserved by their respective cellular providers. Further, digital wide area SMR systems should not be limited to large metropolitan areas, and TELECELLULAR proposes to construct a wide area system in an area traditionally underserved by telecommunications providers, creating employment for the people of Puerto Rico through system construction and operation.

In addition to the public interest benefits associated with the construction and operation of a wide area SMR system, a licensee must make the following showings to justify an extended implementation request:

1) Describe the proposed system;

2) State the amount of time necessary to construct and place the system in operation; and

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[1] See Letter from Ralph A. Haller, Chief, Private Radio Bureau, to David E. Weisman, Esq. (December 23, 1992).

[2] See id.

3) Identify the number of base stations to be constructed and placed in operation during each year of the extended construction period.

In addition, the licensee must show that one of the following three conditions applies to it:

1) Extended implementation is required because of the purpose, size or complexity of the system;

2) The proposed system is to be part of a coordinated or integrated wide area system which will take longer than one year to plan, approve, fund, purchase, construct and place in operation; or

3) A law exists that requires the applicant to follow a multi-year cycle for planning, approval, funding and purchasing the proposed system.[3]

A. Description of the Proposed System.

The proposed system will be a wide area SMR system covering the vast majority of the island of Puerto Rico, having a service area of approximately 3,772 square miles and a population of approximately 3,721,000. The licenses subject to this extended implementation request are located in or near the metropolitan areas of San Juan, Ponce[4] and Mayaguez.

TELECELLULAR intends to construct the system utilizing Motorola Integrated Radio System ("MIRS") radio equipment. MIRS is

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[3] 47 C.F.R. § 90.629(a).

[4] Ponce is the proposed site in applications for modification of ten authorizations currently on file with the Commission and subject to this Request for Extended Implementation.

a digitally based radio system employing Time Division Multiple Access ("TDMA") technology that increases the capacity of a single 25 kHz SMR channel by six times the amount of analog technology.

Due to the mountainous terrain of Puerto Rico and the need to implement a frequency reuse plan to optimize the use of available spectrum, it will be necessary to engineer the system utilizing multiple low power base stations. Each low power base station will be separately licensed and engineered to insure that it does not interfere with co-channel licensees. Any low power base station which does not conform with the Commission's short spacing table contained in Section 90.621 will include a waiver request or a consent letter with the application associated with that station. Because of the reduced coverage resulting from the low power base stations, many more base stations will have to be constructed than in the typical analog SMR system. A more detailed description of the system is contained in the Engineering Statement attached as Exhibit 2.

In addition to voice communication, the MIRS equipment is also capable of providing data transmission, dispatch service and messaging. Upon completion of the proposed system, TELECELLULAR will offer subscribers in Puerto Rico a seamless network that provides dispatch service and data transmission to businesses as well as phone and messaging service to the entire population.

B. Amount of Time Required to Construct the Proposed System.

To ensure an efficient allocation of resources, it is necessary to completely plan the proposed system before

construction begins. TELECELLULAR has initiated negotiations with Motorola regarding the price and availability of its MIRS equipment. On behalf of TELECELLULAR, a preliminary study of the proposed system was commissioned and prepared by Telecom Solutions, Inc. While the preliminary study and other engineering performed on behalf of TELECELLULAR have indicated a tentative system design, the final system design cannot be finalized until an arrangement with Motorola is reached and sites for the many low power base stations are secured. Some aspects of final system design are currently proceeding. However, it is not economical to finalize system design until the Commission has acted on the instant request for extended implementation. Accordingly, with the assumption that the instant request is granted within six months, the following schedule has been estimated with respect to construction of the system:

Begin final system design	November 10, 1994
Begin construction	February 1, 1995
Initiate service	February 1, 1996
System construction complete	November 1, 1999

C. Number of base stations to be constructed per year.

The tentative design of the system prepared by Telecom Solutions, Inc. provides for initial construction of sites using omnidirectional transmission. Using "omni" sites and no frequency reuse in the first year, TELECELLULAR will construct 20 base stations, a number derived from estimated subscriber penetration in the three major metropolitan areas in Puerto Rico: San Juan, Ponce

and Mayaguez. At the end of the first year of service, preliminary market estimates indicate 11,500 subscribers will use TELECELLULAR's system.

In the second year, approximately 21 new base stations will be constructed, 10 in the San Juan region, 4 in the Ponce region and 7 in the Mayaguez region. At the end of the second year of construction, the 41 base stations will be built in the following areas:

Area	Number of Base Stations
San Juan Region	
San Juan	14
Humacao	1
Route 30 (Humacao-Caguas)	1
Route 2 (Arecibo-San Antonio)	5
Route 3 (Carolina-Fajardo)	2
Route 3 (Humacao-Fajardo)	2
Ponce Region	
Ponce	2
Route 52 (Caguas-Ponce)	4
Mayaguez Region	
Mayaguez	1
Aguadilla	1
Arecibo	1
Route 2 (Ponce-Mayaguez)	4
Route 2 (Mayaguez-Aguadilla)	1
Route 2 (Aguadilla-Arecibo)	2

Furthermore, 10 of the 41 constructed sites will be sectorized, thus increasing the capacity of those particular base stations. Sectorization, using directional antennas, allows a base station to transmit a group of frequencies to a specific sector of the base station's radius. By limiting a particular frequency's use to a limited sector of its base station's radius, that frequency can be reused at another base station relatively close to

the first base station. In TELECELLULAR's system, sectorized sites will use a maximum of twelve SMR channels, four channels broadcasting to three sectors of the base station's radius. Through use of sectorization, new frequency blocks will be added to ten of the existing base stations.

In the third year, as subscribers increase, the number of base stations needed to service the projected amount of subscribers will increase to 45. The four additional base stations will be constructed in the Ponce region. The increase in subscribers projected in the other regions will be serviced through continued sectorization of existing base stations in combination with a frequency reuse plan.

In the fourth year, capacity demands will require eight new base stations, for a total of 53. One base station will be added in the San Juan region, five base stations will be added to the Ponce region and two base stations will be added to the Mayaguez region. At the end of the fourth year, all base stations in TELECELLULAR's system will be sectorized.

Finally, in the fifth year, the system will require 73 base stations, an increase of 20 base stations. Ten base stations will be added in the San Juan region and five base stations will be added in both the Ponce and Mayaguez regions. A map of the proposed locations of the base stations at the end of year five is attached as Exhibit 3.

At the end of the fifth year, it is projected that the system's 73 base stations will serve approximately 100,000

subscribers, a market penetration rate of less than 3% of Puerto Rico's population. TELECELLULAR estimates that system construction will cost approximately $50 million.

TELECELLULAR has made a conservative estimate of possible market penetration, and based on that estimate, believes that the 170 SMR channels currently licensed to the Participating Licensees should provide sufficient capacity for its system. However, if the number of users exceeds its estimates, TELECELLULAR may seek more Participating Licensees in the form of SMR operators or licensees to participate. If this situation occurs, a showing will be made as to why these new licensees should be included in TELECELLULAR's extended implementation period.

TELECELLULAR, and specifically the Participating Licensees, understand that they must make yearly certifications to the Commission that the construction benchmarks proposed in this request for extended implementation have been met. Should TELECELLULAR fail to make this certification, the Commission may terminate the authority for an extended implementation period and require the individual licensees to build their systems within six months or forfeit their licenses.

D. The Participating Licensees' SMR authorizations are part of a complex wide area SMR system that will take longer than one year to plan, approve, fund, purchase, construct and place in operation.

The Participating Licensees' Request for Extended Implementation meets the final requirement outlined in Rule 90.629(a): The licenses are part of a wide area system that requires complex engineering and will take more than a year to plan, approve, fund, construct and place in operation. As described above, TELECELLULAR's completed system will include 73 base stations. Simply finalizing the system design given this number of base stations will make compliance with a one year build out requirement nearly impossible. In addition to system design, further details must be finalized with respect to equipment purchasing, site leasing and constructing the base stations. To make this system economically feasible, TELECELLULAR must have the flexibility to construct the Participating Licensees' SMR channels over a period of time.

TELECELLULAR's proposed system is similar to that of a cellular licensee. TELECELLULAR will construct multiple sites throughout its market and will reuse its licensed frequencies to increase capacity. In the cellular context, the Commission has granted those licensees five years to build out their markets once initial build out requirements have been met.[5] Here, TELECELLULAR proposes a system similar in scale to a cellular system and seeks a similar period of time in which to construct.

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[5] See 47 C.F.R. § 22.2 (definition of "Fill-in period").

The Commission has long been justifiably concerned with the problem of warehousing spectrum. However, TELECELLULAR's proposal should not raise those concerns. TELECELLULAR has proposed an aggressive first year build out plan to service a projected 11,500 first year subscribers. If the first year construction benchmark is not met, the Commission may terminate the extended implementation authority. Also, given the Commission's former loading requirement of 70 mobiles per channel in conjunction with the 170 channels subject to this request, TELECELLULAR's system would have been required to show loading of 11,900 at the end of five years. TELECELLULAR expects to almost meet this loading figure in the first year of service, further alleviating any concern the Commission may have regarding warehousing of spectrum.

Grant of TELECELLULAR'S Request for Extended Implementation is consistent with the requirements of Section 90.629(a). It is also consistent with previous grants of waivers of the construction period requested by Dial Page, Inc.[6] and Atlantic Cellular Company, L.P.[7] In those cases, the Commission granted extended implementation to groups of licensees who did not currently have loaded, analog SMR systems in operation. Instead, the applicants were proposing the construction of digital, wide area SMR systems without an existing analog infrastructure, just as TELECELLULAR

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[6] See Letter from Terry L. Fishel, Chief, Land Mobile Branch, to Counsel for Dial Page, Inc. (March 17, 1993) (granting the request for waiver of Rules 90.631(e) and (f)).

[7] See Letter from Terry L. Fishel, Chief, Land Mobile Branch, to Counsel for Atlantic Cellular Company, L.P. (September 27, 1993) (granting the request for waiver of Rules 90.631(e) and (f)).

proposes. Because TELECELLULAR's proposed system meets the requirements of Rule 90.629 and parallels systems proposed by other applicants who successfully secured extended implementation, the instant Request for Extended Implementation should be granted.

IV. REQUEST TO TOLL ONE YEAR CONSTRUCTION REQUIREMENT PENDING CONSIDERATION OF THIS REQUEST FOR EXTENDED IMPLEMENTATION.

Many of the Participating Licensees' authorizations were granted on or around September 27, 1993. It appears that the Commission will require up to six months or more to consider this Request for Extended Implementation. However, most of the Participating Licensees have less than five months in which to construct their facilities under Section 90.631(e) and (f). Accordingly, the Participating Licensees request that the Commission toll the one year build out period pending this Request for Extended Implementation so that they may still have the opportunity to construct their licenses should the Commission deny this Request for Extended Implementation.

The Participating Licensees are fully committed to constructing analog transmitters, if necessary, to protect their authorizations. If the Commission does not grant a tolling of the construction deadline, they will begin construction of their licenses. Such construction will result in the Participating Licensees losing a large benefit associated with an extended implementation schedule: the ability to forego construction of an analog system in favor of building a digital system from the outset. By tolling the time period, the Commission will allow the Participating Licensees to proceed directly to building out a

digital system instead of wasting their resources on an analog system that will soon be replaced by digital equipment.

Accordingly, the Participating Licensees request a tolling of the one year construction period applicable to their licenses. Furthermore, the Participating Licensees request expedited consideration of the tolling request so that they will preserve the largest amount of time possible for building their licenses should the Commission refuse to toll the construction period.

V. CONCLUSION.

Based on the foregoing, the TELECELLULAR joint venture satisfies the requirements outlined in Rule 90.629 for an extended implementation schedule based on its proposed construction of a wide area SMR system in Puerto Rico. Grant of the Participating Licensees' request will also serve the public interest by providing communications services and jobs to the people of Puerto Rico, and is consistent with Commission precedent regarding similar waiver requests.

Furthermore, the Participating Licensees request tolling of the one year construction requirement pending the Commission's consideration of their request for extended implementation. Such tolling will likely only increase the construction period by six months, and would have no effect on the extended implementation schedule, if approved by the Commission.

Finally, the Participating Licensees request that the Commission take expedited action on their request for tolling. By doing so, the Commission will ensure that the Participating Licensees have the opportunity to meet their one year construction period should the request for tolling not be granted.

Respectfully submitted,

THE PARTICIPATING LICENSEES OF TELECELLULAR

By: _____
Richard S. Myers
Sean P. Beatty
Their Attorneys

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Washington, D.C. 20005
(202) 371-0789

May 24, 1994

EXHIBIT 1

LIST OF FREQUENCIES SUBJECT TO REQUEST FOR EXTENDED IMPLEMENTATION

Licensee	Call Sign	Frequencies
Caribbean Spectrum, Inc.	WPDF775	861.78750
		862.78750
		863.78750
		864.78750
		865.78750
	WPDF777	861.53750
		862.53750
		863.53750
		864.53750
		865.53750
	WPDF776	861.28750
		862.28750
		863.28750
		864.28750
		865.28750
SMR Spectrum P.R., Inc.	WPDF784	861.28750
		862.28750
		863.28750
		864.28750
		865.28750
	WPDF786	856.13750
		857.13750
		858.13750
		859.13750
		860.13750
	WPDF785	856.06250
		857.06250
		858.06250
		859.06250
		860.06250
Island Spectrum, Inc.	WPDF787	856.16250
		857.16250
		858.16250
		859.16250
		860.16250
	WPDF789	856.51250
		857.51250
		858.51250
		859.51250
		860.51250

Licensee	Call Sign	Frequencies
Island Spectrum, Inc. (cont'd.)	WPDF788	856.18750 857.18750 858.18750 859.18750 860.18750
Island Digital Communications, Inc.	WPDF792	856.58750 857.58750 858.58750 859.58750 860.58750
	WPDF790	856.53750 857.53750 858.53750 859.53750 860.53750
	WPDF791	856.56250 857.56250 858.56250 859.56250 860.56250
Island Communications, Inc.	WPDF794	856.63750 857.63750 858.63750 859.63750 860.63750
	WPDF795	856.66250 857.66250 858.66250 859.66250 860.66250
	WPDF793	856.61250 857.61250 858.61250 859.61250 860.61250
SMR Digital P.R., Inc.	WPDF798	856.51250 857.51250 858.51250 859.51250 860.51250

Licensee	Call Sign	Frequencies
SMR Digital P.R., Inc. (cont'd.)	WPDF797	856.16250 857.16250 858.16250 859.16250 860.16250
	WPDF796	856.68750 857.68750 858.68750 859.68750 860.68750
Island SMR, Inc.	WPDF801	856.13750 857.13750 858.13750 859.13750 860.13750
	WPDF799	856.58750 857.58750 858.58750 859.58750 860.58750
	WPDF351	857.03750 858.03750 859.03750 860.03750 864.63750
Caribbean SMR, Inc.	WPDF783	861.03750 862.03750 863.03750 864.03750 865.03750
	WPDF782	861.31250 862.31250 863.31250 864.31250 865.31250
	WPDF781	861.51250 862.51250 863.51250 864.51250 865.51250

Licensee	Call Sign	Frequencies
Caribbean Communications, Inc.	WPDF772	861.31250
		862.31250
		863.31250
		864.31250
		865.31250
	WPDF774	861.06250
		862.06250
		863.06250
		864.06250
		865.06250
	WPDF773	861.56250
		862.56250
		863.56250
		864.56250
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Caribbean Digital Communications, Inc.	WPDF779	861.26250
		862.26250
		863.26250
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		862.03750
		863.03750
		864.03750
		865.03750
	WPDF780	861.76250
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		864.76250
		865.76250
Arecibo SMR, Inc.	WPDQ881	861.08750
		862.08750
		863.08750
		864.08750
		865.08750
	WPDQ882	856.63750
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